

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

Yolany PADILLA, *et al.*,

Plaintiffs,

v.

U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT, *et al.*,

Defendants.

Case No. 18-cv-0928 MJP

**DECLARATION OF KELLY M.
L. ROJAS IN SUPPORT OF
PLAINTIFFS' AMENDED
MOTION FOR CLASS
CERTIFICATION**

I, Kelly M. L. Rojas, hereby declare:

1. I am an attorney licensed to practice law in Maryland. My business address is: 1612 K Street NW, Suite 204, Washington, DC 20006. I am admitted to practice in the Court of Appeals of Maryland.
2. I have been practicing immigration law for over 3 years. Currently, I am a Managing Attorney at the Capital Area Immigrants' Rights Coalition. My practice primarily involves assisting immigrants detained in Virginia. I represent individuals before the Arlington Asylum Office, the Arlington and Baltimore Immigration Courts, and the Board of Immigration Appeals.
3. I assist detained individuals whom an asylum officer has determined have a credible fear of return to their country of origin, who initially entered the country without inspection, and who are eligible for release from immigration custody. These individuals are served with Notices to Appear and Notices of Hearing at the Arlington

1 Immigration Court. These individuals regularly wait more than 7 days, and sometimes
2 up to 37 days, for a bond hearing.

- 3 4. I have never had a client receive written bond decisions from immigration judges with
4 particularized findings unless they file an appeal with the Board of Immigration
5 Appeals. When the immigration judge issues a decision in these cases, it is on a
6 Custody Order of the Immigration Judge form.
7

8 I declare under penalty of perjury of the laws of the District of Columbia and the United
9 States that the foregoing is true and correct to the best of my knowledge and belief. Executed
10 the 6th day of September 2018 in Washington, D.C.

11 By: 
12 _____

Kelly M. L. Rojas

CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2018, I filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to those attorneys of record registered on the CM/ECF system. All other parties shall be served in accordance with the Federal Rules of Civil Procedure.

DATED this 6th day of September, 2018.

s/ Glenda M. Aldana Madrid

Glenda M. Aldana Madrid

NORTHWEST IMMIGRANT RIGHTS PROJECT

615 Second Avenue, Suite 400

Seattle, WA 98104

Telephone: (206) 957-8646

Facsimile: (206) 587-4025

E-mail: glenda@nwirp.org